

# **Exhibit C**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Master File No. 09-CV-118 (VM)

PASHA ANWAR, et al.,

Plaintiffs,

v.

FAIRFIELD GREENWICH LIMITED,  
et al.,

Defendants.

This document relates to:

*The Standard Chartered Cases*

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**STANDARD CHARTERED PLAINTIFFS'  
RESPONSE TO REQUESTS FOR PRODUCTION  
RE ROBERT A. PICARD AND GEORGE A. MARTIN**

The Standard Chartered Plaintiffs ("Plaintiffs") hereby respond to the Standard Chartered Defendants' First Sets of Requests for Production of Documents Concerning Robert A. Picard and George A. Martin, respectively ("RFP").

**Objections to Promulgation of the RFPs**

The Plaintiffs object to the RFPs on the following grounds:

1. that they were submitted after the end of the discovery period without obtaining leave of court to institute this discovery;
2. that the pretrial order, which governs expert-related discovery,

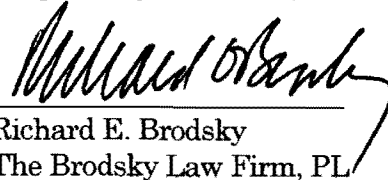
does not authorize requests for production under Fed.R.Civ.P. 34 but permits subpoenas to the proffered expert witnesses, which should be used instead of a request under Rule 34 to obtain otherwise unobjectionable documents;

3. that the RFPs were submitted in bad faith and with the purpose of delay and obfuscation; and

4. that the RFPs impose undue burdens on the Plaintiffs.

The Plaintiffs expressly reserve the right to assert additional objections to the individual requests if the Court rules that the RFPs are not to be stricken.

Respectfully submitted,



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